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14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 ANN ALLEN TAYLOR, an Individual,

18 Plaintiff,

19 vs.

20 24 HOUR FITNESS USA, INC., a Foreign
21 Corporation, DOES I -X; and ROE
22 CORPORATIONS I -X.

23 Defendant.

24 **CASE NO.: 2:18-cv-01812-RFB-VCF**

25 **STIPULATION TO EXTEND TIME**
26 **FOR PLAINTIFF TO RESPOND TO**
27 **DEFENDANT'S MOTION TO COMPEL**
28 **ARBITRATION AND TO STAY**
29 **PROCEEDINGS PENDING**
30 **ARBITRATION**

31 IT IS HEREBY STIPULATED by and between the parties hereto through their
32 respective attorneys that Plaintiff Ann Allen Taylor may have additional time within which to
33 submit Plaintiff's Opposition to Defendant's Motion to Compel Arbitration and to Stay
34 Proceedings Pending Arbitration.

35 1. Under the Federal Rules of Civil Procedure, Plaintiff's Opposition would be due
36 November 8, 2018. *See Fed. R. Civ. P. 12(a)(4)(A).*

37 2. On October 30, 2018, Jenny L. Foley, counsel for Plaintiff, conferred with Amy
38 L. Howard, counsel for Defendant, regarding the timing of Plaintiff's Opposition. Counsel for
39 Defendant consented to Plaintiff's request to enlarge the time for filing the reply by thirty (30)

days, which would make the new deadline Friday, December 7, 2018.

3. Good cause exists for this extension as the parties are in the middle of settlement negotiations and believe the case will settle without judicial involvement.

4. The extension will not result in undue delay in the administration of this cause.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Plaintiff hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Defendant's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

Respectfully submitted,

HKM EMPLOYMENT ATTORNEYS, LLP

DATED: November 7, 2018

By: /s/ Jenny Foley
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**OGLETREE, DEAKINS, NASH, SMOAK &
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DATED: November 7, 2018

By: /s/ Amy Howard
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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 8th day of November, 2018.